

GIA CINCONI (SBN 141668)
 KILPATRICK TOWNSEND & STOCKTON LLP
 Two Embarcadero Center
 Suite 1900
 San Francisco, California 94111
 Telephone: (415) 273-7546
 Facsimile: (415) 723-7173
 gcincone@ktslaw.com

R. CHARLES HENN JR. (*pro hac vice*)
 H. FORREST FLEMMING, III (*pro hac vice*)
 JESSICA W. TRUELOVE (*pro hac vice*)
 1100 Peachtree Street NE
 Suite 2800
 Atlanta, Georgia 30309
 Telephone: (404) 815-6572
 Facsimile: (404) 541-3240
 chenn@ktslaw.com
 fflemming@ktslaw.com
 jtruelove@ktslaw.com

Attorneys for Plaintiff/Counter-Defendant
 IMPOSSIBLE FOODS INC.

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION**

IMPOSSIBLE FOODS INC., a Delaware
 corporation,

Plaintiff/Counter-Defendant,

v.

IMPOSSIBLE LLC, a Texas limited liability
 company, and JOEL RUNYON,

Defendants/Counter-Plaintiffs.

Case No. 5:21-cv-02419-BLF (SVK)

**[PROPOSED] ORDER GRANTING, IN
 PART, DEFENDANT IMPOSSIBLE
 LLC'S ADMINISTRATIVE MOTION TO
 CONSIDER WHETHER ANOTHER
 PARTY'S MATERIAL SHOULD BE
 SEALED**

Judge: Hon. Susan van Keulen

Defendant/Counter-Plaintiff Impossible LLC ("ILLC") filed an Administrative Motion to Consider Whether Another Party's Material Should be Sealed ("ILLC's Motion"). Dkt. No. 118. The subject of ILLC's Motion is a portion of the parties' Joint Statement Regarding Plaintiff's Discovery Responses (Dkt. No. 118-1), which contains information designated confidential under the operative Protective Order (Dkt. No. 87) by a third-party subpoena recipient.

Pursuant to Civil Local Rule 79-5(f)(4) and 79-5(c), Plaintiff/Counter-Defendant Impossible Foods Inc. (“Impossible Foods”) filed a response in support of keeping under seal the information provisionally filed under seal in connection with the parties’ Joint Statement Regarding Plaintiff’s Discovery Responses (Dkt. No. 118-1). Dkt No. 124. Impossible Foods also concurrently filed **Exhibit 1** with its response, which is Impossible Foods’s proposed, more narrowly tailored sealing request of the Joint Statement.

After considering ILLC’s Motion and Impossible Foods’s response, the arguments of counsel, and the evidence of the record, the Court **GRANTS IN PART** ILLC’s Motion and orders the following material to be maintained under seal:

Document	Text to be Sealed	Reasons for Sealing
Joint Statement Regarding Plaintiff’s Discovery Responses	p. 3, ll. 22, 26–28	The information requested to be sealed contains Impossible Foods’s confidential trademark enforcement strategies and negotiations. Public disclosure of such confidential information could significantly harm Impossible Foods’s competitive standing by prejudicing Impossible Foods’s ability to enforce its trademarks in the future, as competitors may alter their business and intellectual property strategies accordingly for competitive gain.

SO ORDERED.

DATED: _____, 2025

HON. SUSAN VAN KEULEN
United States Magistrate Judge